

Handwritten: *Faint Copy*



Department of Environmental Protection

Lawton Chiles
Governor

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

Virginia B. Wetherell
Secretary

December 8, 1995

CERTIFIED MAIL - RETURN RECEIPT

Mr. Han Sunoo, Vice President
Montco Research Products
P.O. Box 235
Janice Drive
Hollister, Florida 32147

Dear Mr. Sunoo:

RE: Warning Letter #WL95-0663HW54NED
FLD 061 897 054
Putnam County - Hazardous Waste

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on May 24, 1995 indicates that violations of Florida Statutes and Rules may exist at the Montco Research Products facility. Department of Environmental Protection personnel made observations described in the attached inspection report. The "Summary of Violations" section of the report lists the alleged violations of Department rules.

Section 403.727 Florida Statutes provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should be ceased.

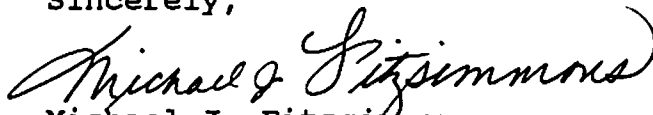
You are requested to contact Karen Balabis or Pamela Fellabaum at (904) 448-4320 within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter. Alternatively, you may respond in writing within thirty (30) days with documentation that all alleged violations have been corrected.

Montco Research Products
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PLEASE BE ADVISED that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. If this matter cannot be resolved within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,


Michael J. Fitzsimmons
Waste Program Administrator


MJF:kkb

Enclosure



Department of Environmental Protection

Lawton Chiles
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Northeast District
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Jacksonville, Florida 32256-7590

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HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ☐ COMPLAINT ☒ ROUTINE ☐ FOLLOW-UP ☐ PERMITTING
FACILITY NAME Montco Research Products DEP/EPA ID FLD 061 897 054
STREET ADDRESS Janice Drive, Hollister, Florida 32047
MAILING ADDRESS P.O. Box 235, Hollister, Florida 32047
COUNTY Putnam PHONE (904) 325-5504 DATE 5/24/95 TIME 9:30 A.M.

TYPE OF FACILITY:

Generator Status

☐ Conditionally
Exempt (<100 kg/mo)
☐ SQG (100-1000 kg/mo)
☒ Generator (>1000 kg/mo)
☐ Non-Handler

Storage

☐ Container
☐ Tank
☐ Waste Pile
☐ Surface
Impoundment

Treatment

☐ Tank
☐ Land Treatment
☐ Thermal
☐ Chem/Phys/Bio.
☐ Incinerator
☐ Surface
Impoundment

Transporter

☐ Transporter
☐ Transfer Facility

Disposal

☐ Landfill
☐ Surface Impoundment
☐ Waste Pile

2. Applicable Regulations:

☐ 40 CFR 261.5 ☒ 40 CFR 262 ☐ 40 CFR 263 ☐ 40 CFR 264

☒ 40 CFR 265 ☐ 40 CFR 266 ☒ 40 CFR 268

3. Responsible Official: Mr. Han Sunoo, Vice President

4. Survey Participants & Principal Inspector: Terry Clayton - MRP
Pam Fellabaum - FDEP
Karen Balabis - FDEP

5. Facility Lat/Long: 29°40'00"/81°47'30"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: _____ Date Issued: _____ Exp. Date: _____

8. Pearranged Inspection: ☐ Yes ☒ No

PROCESS DESCRIPTION:

Montco Research Products (Montco) is a specialty chemical manufacturer that produces three (3) chemical intermediates. Two (2) products, alphachloromethylnaphthalene (ACMN) and ethylbenzylchloride (EBC), are produced continuously, and one (1) product, alphanaphthaldehyde (ANA) is a specialty product which is produced as needed. The facility employs ten (10) people and is located in a rural area of Putnam County, near Hollister, Florida. The facility consists of a main production building which houses the reactor area, the distillation area and the tank farm, a drum storage area, a research and development lab, and two (2) storage buildings. This inspection was unannounced.

The raw materials used by the facility are confidential. Therefore, this report will not include the raw materials which are used by the facility to manufacture their products. A list of these raw materials has been included in a confidential file and will not be revealed to the public, as requested by the facility. Wastes generated by the facility cannot be considered confidential since manifests are used by the facility when shipping wastes to appropriate treatment or disposal facilities.

ALPHACHLOROMETHYLNAPHTHLENE (ACMN)

The facility manufactures ACMN by adding raw materials to one of several large reactors located in the reactor area of the main production building. After the raw materials have reacted, two (2) layers are formed: weak hydrochloric acid (HCl) and crude ACMN. The weak HCl from the reaction is stored in one of the facility's four (4) 12,000-gallon HCl storage tanks located in the tank farm. The facility then regenerates the HCl to strengthen it by adding HCl gas into the HCl storage tanks. Excess HCl is produced during the regeneration process. The excess HCl is either disposed of as hazardous waste or sold as a product to a customer who dilutes it and resells it to a petroleum company.

The crude ACMN is then distilled in the distillation area of the main production building. The ACMN still bottoms are solid. The facility manifests the ACMN still bottoms to Laidlaw Environmental Services (Laidlaw) as non-hazardous waste.

The final ACMN product is sold to customers who use the ACMN to make a rust inhibitor for oil wells. Montco also distills the ACMN twice for customers who use the product in the formulation of heart medication. The facility produces approximately two (2) 4000-gallon batches of ACMN per week, and approximately 2000 gallons of weak HCl are generated from each batch of ACMN.

ETHYLBENZYLCHLORIDE (EBC)

The production of EBC is similar to the production of ACMN. Raw materials are added to one of several large reactors located in the

reactor area of the main production building. After the raw materials have reacted, two (2) layers are formed: weak raw material solution and crude EBC. The weak raw material solution is put into drums and later added to a still. HCl is distilled off, strengthening the remaining raw material. The weak HCl is captured from the still, transferred to drums, and later it is added to one of the 12,000-gallon tanks located in the tank farm.

The crude EBC is stabilized and distilled. In 1991, the facility manifested the EBC still bottoms as D001/F003 hazardous waste to Laidlaw Environmental Services. The EBC still bottoms have a flash point of greater than 140 degrees Fahrenheit and a pH of 7. According to Terry Clayton, plant manager, the facility now uses generator knowledge to dispose of the EBC still bottoms as non-hazardous waste.

The liquid distillate is the final EBC product which is sold for use as a disinfectant in a variety of products such as shampoos and disposable wipes. The facility produces approximately ten (10) 2000-gallon to 3000-gallon batches per week of EBC. It is unclear how much weak HCl is generated from this process.

ALPHANAPHTHALDAHYDE (ANA)

The facility manufactures ANA by distilling raw materials. The crude material is then separated from the slightly acidic water. The wastewater from this process has a pH of approximately five (5). The slightly acidic wastewater is first neutralized and then sent to Industrial Water Services (IWS) in Jacksonville as non-hazardous waste. The ANA still bottoms are solid and are disposed of as non-hazardous waste at Laidlaw Environmental Services (Laidlaw) in Pinewood, S.C. The final ANA product is a specialty product. The facility produces approximately six (6) to eight (8) 1000-gallon batches per year of ANA.

REACTOR AREA

The reactor area consists of five (5) reactors. One (1) 4000-gallon reactor is for the production of ACMN. Three (3) 3000-gallon reactors and one (1) 2000-gallon reactor are for the production of EBC. One (1) 1000-gallon reactor for the production of ANA is located in the distillation area of the main production building. The facility will soon be adding another 3000-gallon reactor to the reactor area. The reactors are painted periodically with a paint gun. Paint guns are cleaned with acetone, and waste acetone is distilled for reuse in the research and development lab. Old paint is not stripped from the reactors.

DISTILLATION AREA

The distillation area contains numerous stills. Some stills are used to distill oil from the vacuum pumps. Acetone is used in the distillation area to clean oil from large distillation flasks. At

the time of the inspection one (1) open 5-gallon bucket of spent F003 waste acetone mixed with used oil and water was accumulating. This is a violation of 40 CFR 265.173. Since the bucket was open, it does not qualify for the satellite accumulation exemption. Therefore, the bucket must be dated. The bucket was neither labeled nor dated. This is a violation of 40 CFR 262.34 (a)(2) and 40 CFR 262.34(a)(3). One (1) 55-gallon satellite drum of F003 spent acetone was accumulating in the distillation area. The drum was closed and properly labeled. The F003 spent acetone will be distilled either in the distillation area or in the research and development lab. EBC residue and used oil are mixed together and collected by M&M Chemical Equipment Co., Inc. as non-hazardous waste. At the time of the inspection ten (10) 55-gallon drums were accumulating EBC residue/used oil in the distillation area. Thirty-one (31) 55-gallon drums of ACMN residue were also accumulating in the distillation area. ACMN residue is shipped to Pinewood, S.C. as non-hazardous waste. One (1) closed 55-gallon drum was accumulating crushed fluorescent bulbs. The facility was accumulating the fluorescent bulbs because they could not locate a fluorescent bulb recycler. Information about fluorescent bulb management is attached to this report.

DRUM STORAGE AREA

A drum storage area is located outside of the main production building. Several groupings of 55-gallon drums were located on a concrete pad (Photos 1 and 2). At the time of the inspection, the following containers were accumulating:

- ten (10) 55-gallon drums of weak EBC raw material were awaiting distillation.
- approximately forty (40) 55-gallon drums of weak HCl from the distillation of EBC which will be pumped into one of the HCl tanks.
- fifteen (15) 55-gallon drums of dirty water from equipment clean out. The dirty water will be neutralized in one of the reactors and then disposed of through IWS.
- three (3) 55-gallon drums of EBC still bottoms.
- approximately sixty (60) 55-gallon drums of crystallized ACMN raw material which will be melted in the facility's hot room for reuse.
- two (2) 55-gallon drums of HCl condensate.
- nine (9) 55-gallon drums of raw materials which will be used for new product development.
- approximately twelve (12) 55-gallon drums of EBC distillate which will be reused in one of the reactors.
- approximately thirty-five (35) 55-gallon drums of low-grade raw material which will be used in small amounts over time in the production of ACMN.

TANK FARM

The facility has eight (8) tanks in the tank farm. One (1) tank is for crude EBC, one (1) tank is for dirty water, one (1) tank is for weak raw material, four (4) tanks are for weak or strong HCl and one (1) tank was empty. The facility does not have to comply with 40 CFR, Subpart J for the HCl tanks. Per 40 CFR 261.4(c), a hazardous waste which is generated in a product or raw material storage tank or in a manufacturing process unit is not subject to regulation under 40 CFR 262 through 265, 268, 270, 271 and 124. The tank farm is equipped with secondary containment. A pipe drains from the containment area onto the ground (Photo 3). According to Mr. Clayton, water is drained from the containment area approximately three (3) times a year when the employees clean the containment area. Per 40 CFR 265.31, the facility must be maintained to minimize the possibility of release of hazardous constituents to the air, soil and surface water. The facility should not discharge cleaning water from the containment area. Rain water is either neutralized in one of the reactors and disposed of through IWS or allowed to evaporate.

Two (2) air scrubbers are located in the tank farm area. Waste water from the air scrubbers is added to the dirty water tank and is collected by IWS as non-hazardous waste.

RESEARCH AND DEVELOPMENT LAB

The research and development lab is used to conduct experiments with different solvents and the crystallization of raw material. Acetone and isopropyl alcohol (IPA) are mixed together and used for cleaning, and toluene is used as a reference in testing. Waste solvents are distilled in a small still located in the lab. According to Mr. Clayton, still bottoms have never been removed from the still. If still bottoms are removed from the still in the future, they must be characterized pursuant to 40 CFR 262.11 and properly disposed of. At the time of the inspection, one (1) 2.5-gallon satellite container was accumulating F003/F005 waste acetone/toluene/IPA/hexane/heptane in the lab. The container was closed, but it was not labeled. This is a violation of 40 CFR 262.34(a)(3). The contents of the container will be distilled and reused. However, the contents of the container are hazardous waste and must be managed as such until they are distilled.

STORAGE BUILDINGS

The facility maintains two (2) open storage buildings. The buildings are used for storing empty drums (Photos 4 and 5), a low grade raw material, spare parts and equipment and other miscellaneous items. Subsequent to the inspection, Mr. Clayton sent documentation to the Department that Laidlaw removed 240 empty 55-gallon drums the day after the inspection.

Elementary neutralization of the combined EBC residue and used oil is also performed in one of the storage buildings. The neutralization process is performed in the bottom of an old storage tank that has had its top cut off. At the time of the inspection, oil, kitty litter, and EBC residue was accumulating in the bottom of the old storage tank.

A roll-off box is located near the storage buildings. Kitty litter, raw material bags, oily rags and other non-hazardous wastes are disposed of in the roll-off box. The contents of the roll-off box are manifested to Laidlaw as non-hazardous waste.

RECORD REVIEW

A review of the facility's records revealed that from 1992-1994, the facility was selling weak HCl solution (pH 0.5) to Cobb Welding and Rental in Jay, Florida for \$1.00 per tanker truck, which is approximately 35,000-40,000 pounds per tanker truck. When the facility cannot find a buyer for the weak HCl solution, the facility manifests it as hazardous waste to Disposal Systems, Inc. in Deer Park, Texas for deep well injection. The facility has manifested approximately 4000 gallons of waste HCl solution to Disposal Systems, Inc. as hazardous waste once a month throughout 1995. Most recently, the facility manifested 4000 gallons (one tanker truck) of waste HCl solution on May 8, 1995. The facility pays 27 cents per gallon for disposal and \$2700 per truck for transportation of the waste HCl. The following manifests of waste HCl solution did not indicate hazardous waste codes:

Manifest Number	Date
00001	2/15/93
00002	2/20/93
00003	2/20/93
00004	2/18/95
00005	3/11/95
00006	4/12/95
00007	5/8/95

The facility also manifested approximately 11,000 gallons of waste zinc chloride solution to Disposal Systems Co. Inc. as hazardous waste in 1993 on manifest numbers 00031, 00032 and 00033 without indicating hazardous waste codes. This is a violation of FAC 62.730.160(4).

Further review of the facility's manifests and accompanying LDRs revealed that the facility rennumbers the manifests for each new waste stream. For instance, the facility has a manifest number 00001, dated 2/15/95 for waste HCl solution, a manifest number 00001, dated 2/27/95 for non-hazardous trash and debris going to Pinewood and a manifest number 00001, dated 8/16/95 for D001/F003 waste EBC. A unique five (5) digit manifest number must be assigned to each manifest per 40 CFR 262 Appendix Item 1.

The facility manifests approximately 40,000 pounds of still bottoms to Laidlaw as non-hazardous waste approximately three (3) times per year. The facility manifests approximately one (1) roll-off box of non-hazardous trash and debris to Laidlaw once every other month. The facility manifests approximately 5000 gallons of EBC still bottoms mixed with used oil as non-hazardous waste to M & M Chemical Equipment Co., Inc. every other month. In 1993, the facility manifested approximately 12,000 gallons of waste corrosive benzyl chloride mixture to Laidlaw as D002/P028 hazardous waste in March 1993. This waste stream was from the production of benzyl chloride, which is no longer manufactured at the facility. The facility manifested approximately 8000 gallons of waste toluene/waste chlorotoluene to Laidlaw as D001/D002/D006 hazardous waste in June 1993. This waste stream was from the production of trichlorotoluene and dichlorotoluene, which is no longer manufactured at the facility. IWS collects wastewater from the facility approximately two (2) times per month.

Montco Research Products is currently a Large Quantity Generator of hazardous waste. The facility originally notified as a Small Quantity Generator. According to Mr. Clayton, the Department was notified verbally of the facility's status change. However, the facility has not submitted a change of status form as required by FAC 62-730.150(5). A change of status form will be included in this report.

Further review of the facility's records to determine compliance with all regulations applicable to a Large Quantity Generator revealed no violations. The facility filed a Biennial Report in 1994 as required by 40 CFR 262.41. The facility has a full Contingency Plan, provides formal hazardous waste training for all employees, and provides job descriptions for all employees.

SUMMARY OF VIOLATIONS

The following are violations of the Florida Administrative Code Sections 62-730.160 and 62-730.180 which adopt and incorporate by reference Title 40 Code of Federal Regulations (CFR) Parts 262 and 265.

40 CFR 262.34(a)(2) - Accumulation Time

(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

(2) The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

VIOLATION: The facility failed to date the one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.

40 CFR 262.34(a)(3) - Accumulation Time

(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status provided that:

(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste";

VIOLATION: The facility failed to label the following containers of hazardous waste:

1. The one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.
2. The one (1) 2.5-gallon satellite container of accumulating F003/F005 waste acetone/toluene/IPA/hexane/heptane in the research and development lab.

40 CFR 262 Appendix Item I - Generator's U.S. EPA ID Number - Manifest Document Number.

Enter the generator's U.S. EPA twelve digit identification number and the unique five digit number assigned to this Manifest (e.g., 00001) by the generator.

VIOLATION: The facility failed to assign a unique five digit number to each manifest.

40 CFR 265.173(a) - Management of Containers

(a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

VIOLATION: The facility failed to close the one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.

The following are violations of the Florida Administrative Code, Chapter 62-730.

62-730.15 - General

(5) EPA Form 8700-12 is hereby adopted and incorporated by reference as published in the February 26, 1980 Federal Register and revised in the November 29, 1985 Federal Register. All generators, transporters, or persons who own or operate a facility which treats, stores, or disposes of hazardous waste must notify the Department using this form, unless they have notified EPA prior to the effective date of this rule. All generators, transporters, or persons who own or operate a facility which treats, stores, or disposes of hazardous waste, and everyone required to notify under Rule 62-730.181, F.A.C., shall notify the Department of all changes in status and shall use this form to do so.

VIOLATION: The facility failed to file a change of status form when it became a Large Quantity Generator of hazardous waste.

62-730.160 (4) Standards Applicable to Generators of Hazardous Waste

(4) Generators of hazardous waste shall complete the following sections of the Uniform Hazardous Waste Manifest: Items 1 through 20, D, F, H, I, and K on Form 8700-22, and Items 21 through 35, O, Q, R, and T on Form 8700-22A. Copies of a list of vendors which supply the form and instructions may be obtained by contacting the Hazardous Waste Regulation Section, Division of Waste Management, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

VIOLATION: The facility failed to indicate hazardous waste codes on the following manifests:

Montco Research Products
Hazardous Waste Inspection of
May 24, 1995
Page 9

Manifest Number	Date
00001	2/15/93
00002	2/20/93
00003	2/20/93
00004	2/18/95
00005	3/11/95
00006	4/12/95
00007	5/8/95
00031	1993
00032	1993
00033	1993

RECOMMENDED CORRECTIVE ACTIONS

40 CFR 262.34 (a) (2)

- Within one (1) day the facility shall date the one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.

40 CFR 262.34(a) (3)

- Within one (1) day, the facility shall label the following containers with the words "hazardous waste":
 1. The one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.
 2. The one (1) 2.5-gallon satellite container of accumulating F003/F005 waste acetone/toluene/IPA/hexane/heptane in the research and development lab.

40 CFR 262 Appendix Item 1

- Effective immediately and henceforth, the facility shall assign one (1) unique five (5) digit manifest number to each hazardous waste manifest.

40 CFR 265.173(a)

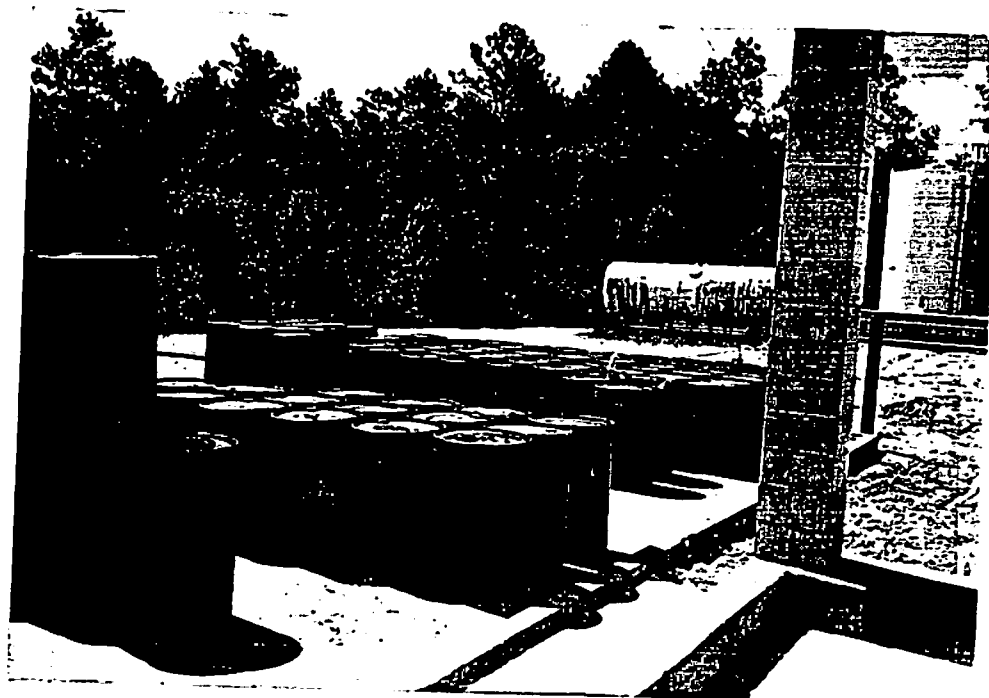
- Within one (1) day, the facility shall close and keep closed except when adding or removing waste the one (1) open 5-gallon bucket of F003 waste acetone mixed with used oil and water in the distillation area of the main production building.

62-730.150(5)

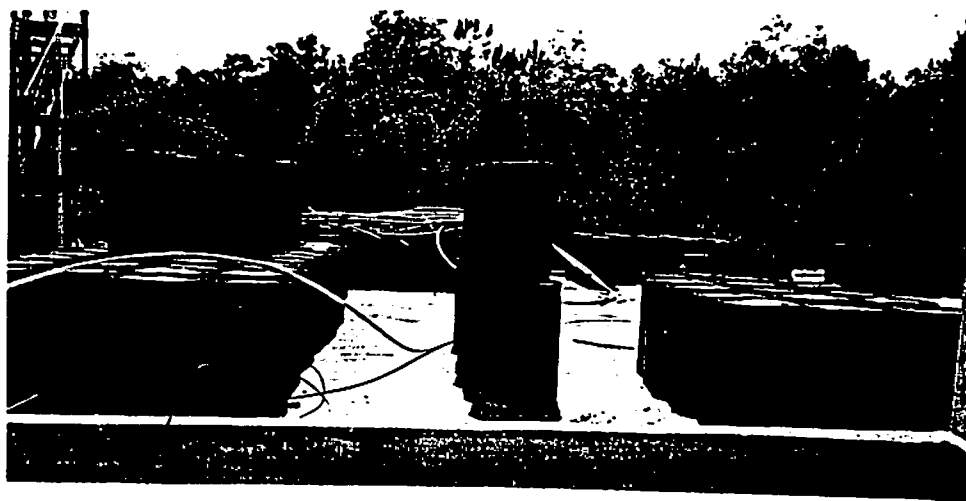
- Within ten (10) days, the facility shall send a completed change of status form to the Department's Tallahassee office.

62-730.160(4)

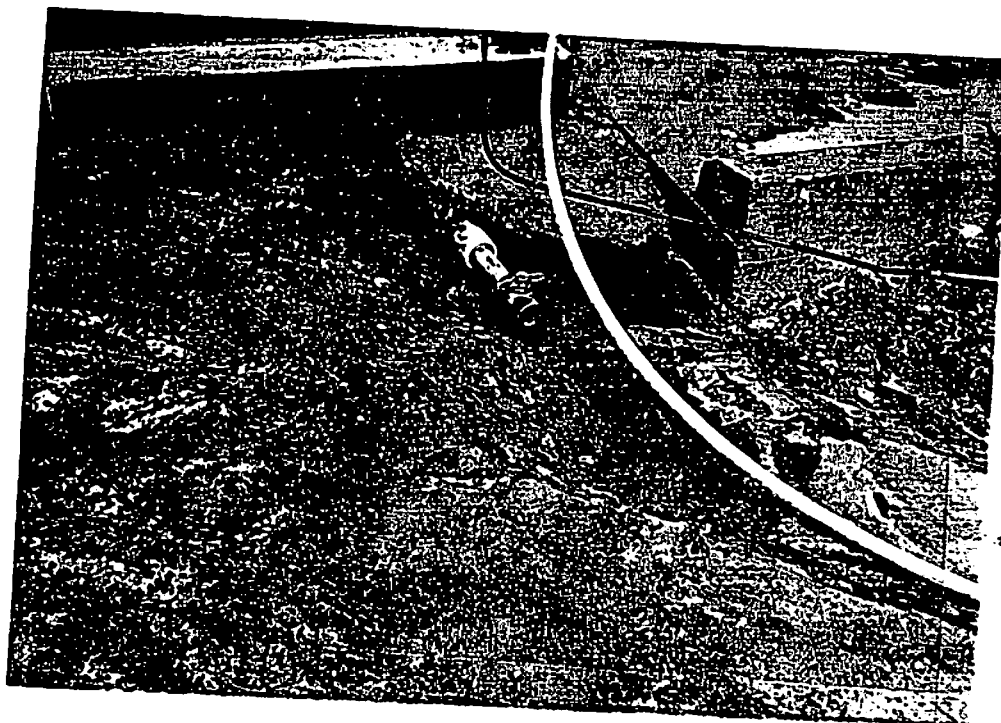
- Effective immediately and henceforth, the facility shall assign the appropriate waste codes to all shipments of hazardous waste.



MONTICO RESEARCH PRODUCTS PHOTO 1
— 5/24/95 —
PHOTO: KAREN BALABIS



MONTICO RESEARCH PRODUCTS PHOTO 2
— 5/24/95 —
PHOTO: KAREN BALABIS



— MONTICO RESEARCH PRODUCTS PHOTO 3 —
5/24/95
PHOTO: KAREN BALABIS



— MONTICO RESEARCH PRODUCTS PHOTO 4 —
5/24/95
PHOTO: KAREN BALABIS



— MONTICO RESEARCH PRODUCTS
5/24/95
PHOTO: KAREN BALABIS

PHOTO 5 —

Date 5/24/95
Inspector Fellabaum/Balabis
Facility ID# FLD 061 897 054

RCRA INSPECTION REPORT
GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification No.

1. Site Name: Montco Research Products
2. Responsible Official: See report
3. Survey Participants: See report

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30-261.33 - List of Hazardous Waste)? ☒ Yes ☐ No
 - a. If yes, list wastes, EPA numbers and quantities. FO03 / FO05, FO28
2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, toxicity characteristic) (261.20-261.24 - Characteristics of Hazardous Waste) ☒ Yes ☐ No
 - a. If yes, list wastes, EPA numbers, and quantities. DO02, DO01, DO06
 - b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge? ☒ Yes ☐ No
 - (1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)? ☒ Yes ☐ No
 - (2) If equivalent test methods used, attach copy of equivalent methods used.
3. Is generator subject to full regulation under Part 262? (If no, check appropriate exemptions) ☒ Yes ☐ No

Conditionally exempt small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices and checklist)

OR

Produces non-hazardous waste at this time (261.4 - Exclusions) ☒

OR

Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.)

DATE _____
FACILITY ID _____

OR

Being a farmer disposing of waste pesticides for his own use on his own property (262.10(d) - Farmers) _____

OR

Burns hazardous waste as a fuel for the purpose of recovering usable energy (266.30(c)(2)) _____

Section C - Manifest (262.20-262.23)

1. Has generator shipped hazardous waste off-site since November 19, 1980? (Subpart B - The Manifest)

☒ Yes ☐ No

a. If no, do not fill out Section C and D.

- b. If yes, identify primary off-site facilities.
List facilities in narrative report.

Disposal Systems Inc

2. Does generator use manifest? (262.20 - General requirements)
Is EPA form 8700-22 (Rev 9-88) used?

☒ Yes ☐ No
☒ Yes ☐ No

If yes, inspect manifests at random. Do all manifests reviewed include the following information?
(262, Appendix) (Check items not on manifest.)

a. Generator EPA ID No.

☒ Yes ☐ No

b. Manifest Document No.

☒ Yes ☐ No

c. Generator's Name, Mailing Address, Telephone No.

☒ Yes ☐ No

d. Transporter(s) Name, EPA I.D. No., Telephone No.

☒ Yes ☐ No

e. Facility Name, Address, EPA I.D. No., Telephone No.

☒ Yes ☐ No

f. DOT description of the waste

☒ Yes ☐ No

g. (1) Containers (number and type)

☒ Yes ☐ No

(2) Quantity (weight or volume)

☒ Yes ☐ No

h. EPA waste no.

See report
☒ Yes ☒ No

i. Emergency Information (optional)
(Special handling instructions, Phone No.)

☒ Yes ☐ No

j. Is the following certification on each manifest form?

☒ Yes ☐ No

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and

are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.

k. Signatures and dates

- (1) Generator
- (2) Transporter
- (3) Disposer (returned copy)

☒ Yes ☐ No
☒ Yes ☐ No
☒ Yes ☐ No

- l. Indicate number of manifests inspected and number of violations. *mr*
Note type of violation in report.

~ 50
see report

- m. If copy of manifest from facility was not returned within 35 days, did generator file an exception report? (262.42 - Exception reporting)

N/A
☐ Yes ☐ No

If yes, did it contain the following information?
Legible copy of manifest

☐ Yes ☐ No

AND

Cover letter explaining generators efforts to locate waste.

☐ Yes ☐ No

- n. Does (will) generator retain copies for 3 years?

☒ Yes ☐ No

Section D - Pre-Transport Requirements (262.30-262.34)

☐ N/A

1. Does generator package waste for transport?

☐ Yes ☒ No

If no, skip to question 2.

If yes, complete the following questions.

transporter does

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging)

☐ Yes ☐ No

DATE _____
FACILITY ID _____

3. Inspect containers to be shipped.

a. Are containers to be shipped in good condition?
(Describe containers and condition; i.e, leaking or
corroding or bulging.) ___Yes ___No

b. Is there evidence of heat generation from
incompatible wastes in the containers? ___Yes ___No

4. Before shipping, does the generator use DOT labeling
requirements in accordance with 49 CFR 172?
(263.31 - Labeling) ___Yes ___No

5. Does the generator mark each package in accordance
with 49 CFR 172? (262.32 - Marking) ___Yes ___No

6. Is each container of 110 gallons or less marked with the
following label? (262.32 - Marking) ___Yes ___No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits
Improper Disposal. If found, contact the
nearest police or public safety authority
or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading
hazardous waste, inspect for presence of placards. Note this
instance on narrative explanation sheet. (262.33 - Placarding)

a. Does the generator have the appropriate placards to
offer the initial transporter? ___Yes ___No

b. If no, who provides placards? _____

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility?
If yes, skip to question #9. ___Yes ☒ No

If no, answer rest of question #8.

b. Does the facility comply with the 90-day
accumulation time limit? (262.34(a)) ☒ Yes ___No

If no, has the generator been granted a 30-day
extension? (262.34(b)) ___Yes ___No

If yes, explain the unforeseen/uncontrollable
circumstances in the narrative.

DATE _____
FACILITY ID _____

- c. Are containers used to store wastes? (262.34(a)(1)) ☒ Yes ☐ No

If yes, complete Container Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2))

see report
☐ Yes ☒ No

- d. Are tanks used to store wastes? (262.34(a)(1))

☐ Yes ☒ No

If yes, complete Tanks Checklist for Generators.

- e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))

see report
☒ Yes ☒ No

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-262.43)

☐ N/A

Explain _____

1. Is generator keeping the following reports? (262.40 - Record keeping)
(Note: The following must be kept for a minimum of three years.)

a. Biennial reports (262.41).

☒ Yes ☐ No

b. Exception reports where applicable (262.42).

N/A
☐ Yes ☐ No

c. Test results where applicable.

☒ Yes ☐ No

2. Where are records kept (at facility or elsewhere)? at facility

3. Who is in charge of keeping the records?

Name Terry Clayton Title Supervisor

4. Any additional reporting? (262.43 - Additional Reporting) ☐ Yes ☒ No

Section F - Special Condition (262.50 - International Shipments)

☐ Yes ☐ No

Explain _____

DATE _____
FACILITY ID _____

1. Has generator received from, or transported to, a foreign source, any hazardous waste? ☐ Yes ☒ No
- a. If yes, has he filed a notice with the Regional Administrator? ☐ Yes ☐ No
- b. Is this waste manifested and signed by Foreign consignee? ☐ Yes ☐ No
- c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? ☐ Yes ☐ No

Appendix A

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? ☒ Yes ☐ No
- a. Is training on-the-job? ☒ Yes ☐ No
- b. Is training in the classroom? ☒ Yes ☐ No
2. Do laborers who handle hazardous waste complete training? ☒ Yes ☐ No
- a. Is training on-the-job? ☒ Yes ☐ No
- b. Is training in the classroom? ☐ Yes ☒ No
3. Does training include:
- a. Emergency response procedures? ☒ Yes ☐ No
- b. Inspection procedures? ☒ Yes ☐ No
- c. Operation of hazardous waste handling equipment? ☒ Yes ☐ No
4. How often is training reviewed? annually
5. Does the facility have personnel training records including:
- a. Job title and description of position? ☒ Yes ☐ No
- b. Description of employee's training? ☒ Yes ☐ No
6. Are records maintained for three years? ☒ Yes ☐ No

DATE _____
FACILITY ID _____

Section B - Preparedness and Prevention (265.30-265.37)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) ☐ Yes ☒ No

If yes, use narrative explanation.

2. Is the facility equipped with (265.32 - Required equipment)

- a. Internal communications or alarm system? voice ☒ Yes ☐ No
Is it easily accessible in case of emergency? ☒ Yes ☐ No

- b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No

- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No
Is this equipment tested to assure its proper operation? ☒ Yes ☐ No

How frequently? as needed

- d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No

(1) Describe source of water private well

(2) Indicate flow rate and/or pressure and storage, if applicable. _____

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between containers to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) N/A ☐ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities) N/A ☒ Yes ☐ No

If N/A, explain _____

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities) ☒ N/A ☐ Yes ☐ No

If yes, indicate primary authority Hollister Fire Dept

Is the fire department a city or volunteer fire department? volunteer

6. Does the owner/operator have phone numbers of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities) ☒ Yes ☐ No
- Are they readily available to the emergency coordinator? ☒ Yes ☐ No
7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities) ☒ Yes ☐ No
- If no, has the owner/operator attempted to do this? ☐ Yes ☐ No
8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37(b) - Arrangements with Local Authorities) ☒ NA ☐ Yes ☐ No

Section C - Contingency Plan and Emergency Procedures (265.50-265.56)

1. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan) ☒ Yes ☐ No
2. Is it maintained at the facility? (265.53 - Copies of Contingency Plan) ☒ Yes ☐ No
3. Is the contingency plan a revised SPCC Plan? (265.53 - Content of Contingency Plan) ☐ Yes ☒ No
- a. Does the plan include:
- (1) Action personnel will take? ☒ Yes ☐ No
 - (2) Evacuation routes? ☒ Yes ☐ No
 - (3) Emergency equipment? ☒ Yes ☐ No
 - (4) Is the emergency equipment properly inspected and maintained? ☒ Yes ☐ No
4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? ☒ Yes ☐ No
5. Who is the emergency coordinator? Terry Clayton
6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53 - Copies of Contingency Plan) ☒ Yes ☐ No

Date 5/24/95
Inspector Fellabaum/Balabis
Facility ID#

CONTAINERS STORAGE CHECKLIST FOR GENERATORS

(40 CFR Part 265, Subpart I - Use and Management of Containers)

1. Are the containers in good condition (265.171)? (Check for leaks, corrosion, bulges, etc.) ☒ Yes ☐ No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? ☒ Yes ☐ No
3. Is the waste compatible with the containers and/or its liner (265.172)? ☒ Yes ☐ No
4. Are the containers kept closed except when adding or removing wastes (265.173(a))? See report
☒ Yes ☒ No
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? ☐ Yes ☒ No

If yes, explain using narrative.

6. Are each of the containers inspected at least weekly (265.174)? N/A (satellite)
☐ Yes ☐ No

If no, explain using narrative concerning the frequency of inspection.

7. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line (265.176)? ☒ N/A ☐ Yes ☐ No

If no, explain using narrative and document with photograph.

8. Are incompatible wastes stored in the same containers? N/A
☐ Yes ☐ No

If yes, explain using narrative.

9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance (265.177)? N/A
☐ Yes ☐ No

If no, explain using narrative.

Rev 1-92

ACRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD 061 897 054 Date of Inspection: 5/24/95

Facility Name: Montco Research Products

Facility Address: P.O. Box 235, Janice Drive.
Hollister, FL 32147

Facility Phone #: 904 325-5504 Facility Contact: Terry Clayton

Contact's Title: Plant Manager

Persons present for Inspection: Terry Clayton - Montco

Pam Fellebaum - FDEP

Karen Balabis - FDEP

Date and Time Inspection Began: 5/24/95 ; 9:30am

Date and Time Inspection Ended: 5/24/95 ; 5:00pm

1. (a) Describe the generator's restricted waste streams (use the IDR Treatment Standards list) and the destination of each.

D002 ⇒ waste HCL solution ⇒ Disposal Systems Inc

D002/P028 ⇒ waste corrosive benzyl chloride ⇒ Laid law

D001/D002/0006 ⇒ waste toluene/waste chlorotoluene ⇒ Laid law

D001/F003 ⇒ EBC still bottoms ⇒ Laid law

(b) Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WH, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Third includes variance until 8-8-90: Minimum Technology]

see report

(c) Is the generator storing restricted waste on site?

yes

Is the generator complying with 268.50?

yes

Is the generator complying with 262.34 as required by 268.50(a)(1)?

no

Are the wastes identified correctly?

see report

Revision #1
Date 3-12-91

Have LDR wastes been stored over 90 days (generator)?

NO

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal?

N/A

(d) Does the generator have a case-by-case extension or a variance? (specify)

N/A

II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: yes

Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):

yes

Manifest Document #'s: yes

Waste Analysis Data, where available: N/A

Certification Statement if Generator is
Claiming to meet Treatment standards: N/A

Revision #1
Date 3-12-91

Date Waste is Subject to Prohibitions if

Subject to a Case-By Case Extension or Variance: N/A

III. Does the generator maintain the above records on-site for five (5) years?

yes

IV. Additional Notes and Comments:

(Check for soft hammer compliance prior to May 8, 1990.)

Revision #1
Date 3-12-91